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**Testimony on Senate Bill 878 – Enhanced 911 Phone Requirements
Senate Commerce Committee - Wednesday, May 25, 2016**

My name is Charlie Owens and I am the State Director for the National Federation of Independent Business, an advocate for Michigan small businesses owners since 1943. Thank you for this opportunity to come before the committee and testify in support of Senate Bill 878 sponsored by Senator Mike Shirkey. This bill would move the current compliance deadline for enhanced 911 multi-line telephone systems from the end of this year to the end of 2019.

The Michigan Public Service Commission (MPSC) has issued rules regulating the provision of 911 service over Multi-Line Telephone Systems. Under current multi-line phone systems (MLTS/PBX systems), an outgoing call to a 911 emergency operator indicates the street location where the call is coming from. The rule changes require that the phone system give the 911 operator more precise information that would include the actual location within the building, such as a specific office or conference room for example, in addition to the street location of the business.

Since many existing multi-line phone systems do not have this capability, most small businesses covered by the rule change would be required to replace them with newer systems – even if the existing phone system meets the current needs of the business owner. Replacing a typical multi line phone system can run into the thousands of dollars in addition to the time and expense for installation and training on a new system.

The original rule was written to apply to larger businesses with more than 40,000 square feet, but during the rules promulgation process the square footage threshold was lowered to 7,000 square feet. Also, the required changes were initially scheduled to take effect on December 31, 2011, but the deadline was extended to December 31, 2016.

Business locations that own MLTS/PBX systems, but are unable to meet the deadline of December 31, 2016 for compliance with the rules are required to notify the Michigan State Police and the Michigan Public Service Commission by letter to be dated no later than December 1, 2016. The rules also state that businesses in violation of the act after December 31, 2016 may be assessed a fine by the commission from \$500.00 to \$5,000.00 per offense.

While NFIB and other business groups are willing to work towards addressing this rule change and the problems it will create for small business, the deadline date of December 31 of this year is totally unrealistic.

In addition to the challenges this rule change is creating for affected facilities, it is doubtful that all of the 911 regions participating in this upgrade have a universal ability to interface with all new MLTS/PBX systems that meet the requirement. In other words, a new system that meets the requirement for one 911 region,

may not work in a different 911 region. A business with multiple locations that cross 911 jurisdictions could be required to have two different systems.

Finally, there is even confusion as to what state agency has the authority to implement the rule – the Michigan State Police or the Michigan Public Service Commission. Asking small businesses to deal with two agencies for the same rule is proof positive that this rule needs to be sent back to the drawing board and the December deadline rescinded.

We conclude by asking for your support of 878 that would extend the deadline for compliance with Enhanced 911 phone requirements to 2019.